Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
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RE: Delete, Delete, Delete	)	
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	)	**GN Docket 25-133**
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To: The Commission	)	
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COMMENTS

I offer the following Comments in response to the above captioned proceeding.

I. Develop an "Auto Purging" Methodology to Cancel Deceased Holder Licenses

The Commission has had lifetime commercial radio operator and maintainer licenses for many years. As it stands now, there is no method in place to determine date of death for licensees beyond notification from family, if heirs are aware of the existence of a lifetime license.

The Commission has, in licensee databases, the Taxpayer Identification Number (TIN) for almost all licensees. As such, a routine, scheduled comparison between Social Security Deceased Taxpayer Identifcation Numbers to TINs in Commission database records could serve to identify and then enable Commission cancellation/deletion of deceased holder licenses. Advances in speed and efficiency of database processing should make doing such comparisons both simple and expedient.

Continuing existence of deceased holder licenses and Commission record copies may allow fraudulent claims by businesses of having duly-licensed, qualified employees. In the Aircraft and Maritime Radio Services, copies of fraudulent, deceased holder licenses might result in improperly installed and poorly performing radio transmitter equipment with possible life safety consequences.

In 2016, Petition for Rulemaking RM-11760 was filed by Mark Krotz,[1] proposing lifetime Amateur Service licenses. The Wireless Bureau at that time claimed that costs of processing renewals of Amateur licenses were not burdensome.[2] Even if claimed to be not burdensome, they come at a cost and require time for the Commission to process and grant. A similar claim, applicable to Part 95, Subpart E General Mobile Radio Service (GMRS) licenses could have been made at the time, but was not. Both Part 95 GMRS and Part 97 Amateur licenses have identical 10 year terms and require processing and fee payments to renew.

As it stands now, the only methods for decedent notification are from the deceased's family or from other licensees providing published documentary evidence of death. Funds received for renewals is about $35 per Amateur Service licensee and slightly more for GMRS licensees; and are likely much less than the actual cost and burden on Commission staff for processing. It is my understanding that the license fees received do not accrue to the credit of the Commission in its costs of operation, but instead go to the US Treasury. Even with computerized and Internet-based processing, the costs and burden take their toll on Commission resources. Lifetime licensure would reduce Commission costs and would be congruent with the idea of reducing Commission workload and effort.

There are other inconsistencies in license grants. Arguments that somehow Amateur Service operators and their station license "dual-status" are unique, and therefore not grantable for a lifetime are not accurate.[3] For example, Part 95 Citizens Band operator and station licenses come bundled with the purchase of equipment and are forever unless revoked; as is the case with

[1] https://docs.fcc.gov/public/attachments/DA-16-707A1.pdf
[2] Ibid, at 3.
[3] Ibid, at 6.

small craft Part 80 Maritime Service radios. Part 95 GMRS radio licenses are both operator and station grants bundled into the same license.

It is ludicrous to argue [that] somehow Amateur Service licensees are more in need of "relevant knowledge" than are lifetime-grant commercial licensees in the life-safety, regulated Part 80 Maritime and Part 87 Aircraft Radio Services. The most effective and efficient license database management would be served by permanent operator and station licensure across all services. Once issued, no Commission intervention would be necessary, except for licensee address changes, which take place via the Internet-based Universal Licensing System at little to no cost or involvement for the Commission.

Pleadings for periodic renewals, at least for the Amateur Service, serve to highlight and underscore the frustrated attempts to stem amateur organization membership roll attrition by favoring periodic renewals. And interest in some in speeding along the callsign recycling of "premium," highly-desired Extra Class 1X2 or 2X1 callsigns via, if nothing else, a 10-year automatic purge for non-renewal. Again, a periodic Commission record comparison of TINs with Social Security deceased TIN data files could provide for expeditious identification and cancellation of deceased holder licenses of all types and not require a renewal process to purge deceased license holders. Without a periodic comparison as I propose, the "default" non-renewal period may, in some cases, approach the full, 10-year term if the license of a deceased holder was recently renewed and no one steps forward to provide decedent information.

Should the Commission needlessly expend taxpayer funds to stir licensee renewal paperwork mainly at the behest of at least one not-for-profit Volunteer Examination Coordinator to collect renewal-filing service fees? I opine that it shouldn't. Let's delete that process. Lifetime licensure in the only two remaining services requiring periodic renewal will enhance Commission efficiency and license database accuracy.

II. Revise Part 80 Maritime Service Rules to Permit Limited Event Broadcasts

Revise Part 80 Maritime Service rules to permit public event broadcasts with limited transmitter power in the vicinity of navigable waterways. A Petition for Rulemaking proposing this was submitted on November 7, 2024, with the intention of revising rules to permit such transmissions.[4] To date, it has received no further consideration. As evidenced in the filing, numerous United States military flight demonstration team performances take place near waterways and are observed from watercraft. Providing event-limited low power maritime broadcasting authority would also benefit overall maritime safety by encouraging watercraft owners and operators to install and be familiar with the use of marine radios.

Part 80 rules could be revised to permit onshore, temporary low-power event public address transmissions without filing applications and processing license grants for fixed, shore station licenses.

Thank you for the opportunity to offer my comments and suggestions on this worthwhile undertaking to streamline and improve Commission operational efficiency.

Respectfully,

/s/

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[4] https://www.fcc.gov/ecfs/document/110896366001/1